

Internal Revenue Service, Treasury

§ 1.664-4T

TABLE F(13.8)—WITH INTEREST AT 13.8 PERCENT, SHOWING FACTORS FOR COMPUTATION OF THE ADJUSTED PAYOUT RATE FOR CERTAIN VALUATIONS
[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than				
	1	1.000000	.968704	.953301	.943123
1	2	.989285	.958325	.943087	.933018
2	3	.978685	.948056	.932982	
3	4	.968199	.937898	.922985	
4	5	.957824	.927849		
5	6	.947561	.917907		
6	7	.937408	.908072		
7	8	.927364			
8	9	.917428			
9	10	.907598			
10	11	.897873			
11	12	.888252			
12878735			

TABLE F(14.0)—WITH INTEREST AT 14.0 PERCENT, SHOWING FACTORS FOR COMPUTATION OF THE ADJUSTED PAYOUT RATE FOR CERTAIN VALUATIONS
[Applicable after April 30, 1989]

1 Number of months by which the valuation date for the first full taxable year of the trust precedes the first payout		2 Factors for payout at the end of each period			
		Annual period	Semiannual period	Quarterly period	Monthly period
At least	But less than				
	1	1.000000	.968293	.952691	.942382
1	2	.989140	.957778	.942345	.932148
2	3	.978399	.947377	.932111	
3	4	.967774	.937088	.921989	
4	5	.957264	.926912		
5	6	.946868	.916846		
6	7	.936586	.906889		
7	8	.926415			
8	9	.916354			
9	10	.906403			
10	11	.896560			
11	12	.886824			
12877193			

(7) [Reserved] For further guidance, see § 1.664-4T(e)(7).

(f) *Effective/applicability dates.* This section applies after April 30, 1999, and before May 1, 2009.

[T.D. 8540, 59 FR 30117, June 10, 1994, as amended by T.D. 8819, 64 FR 23199, Apr. 30, 1999; T.D. 8886, 65 FR 36919, 36943, June 12, 2000; T.D. 9448, 74 FR 21465, May 7, 2009]

§ 1.664-4T Calculation of the fair market value of the remainder interest in a charitable remainder unitrust (temporary).

(a) [Reserved] For further guidance, see § 1.664-4(a).

(1) Life contingencies determined as to each life involved, from the values of *lx* set forth in Table 2000CM contained in § 20.2031-7T(d)(7) in the case of transfers for which the valuation date is on or after May 1, 2009; or from Table 90CM contained in § 20.2031-7A(f)(4) in the case of transfer for which the valuation date is after April 30, 1999, and before May 1, 2009. See § 20.2031-7A(a) through (e), whichever is applicable, for transfers for which the valuation date is before May 1, 1999; (a)(2) through (c) [Reserved] For further guidance, see § 1.664-4(a)(2) through (c).

(d) *Valuation.* The fair market value of a remainder interest in a charitable

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remainder unitrust (as described in §1.664-3) for transfers for which the valuation date is on or after May 1, 2009, is its present value determined under paragraph (e) of this section. The fair market value of a remainder inter-

est in a charitable remainder unitrust (as described in §1.664-3) for transfers for which the valuation date is before May 1, 2009, is its present value determined under the following sections:

Valuation dates		Applicable regulations
After	Before	
12-31-51	01-01-52	1.664-4A(a).
12-31-70	01-01-71	1.664-4A(b).
11-30-83	12-01-83	1.664-4A(c).
04-30-89	05-01-89	1.664-4A(d).
04-30-99	05-01-99	1.664-4A(e).
	05-01-09	1.664-4A(f).

(e) *Valuation of charitable remainder unitrusts having certain payout sequences for transfers for which the valuation date is on or after May 1, 2009—(1) In general.* Except as otherwise provided in paragraph (e)(2) of this section, in the case of transfers for which the valuation date is on or after May 1, 2009, the present value of a remainder interest is determined under paragraphs (e)(3) through (e)(7) of this section, provided that the amount of the payout as of any payout date during any taxable year of the trust is not larger than the amount that the trust could distribute on such date under §1.664-3(a)(1)(v) if the taxable year of the trust were to end on such date. See, however, §1.7520-3(b) (relating to exceptions to the use of the prescribed tables under certain circumstances).

(2) *Transitional rules for valuation of charitable remainder unitrusts.* (i) For purposes of sections 2055, 2106, or 2624, if on May 1, 2009, the decedent was mentally incompetent so that the disposition of the property could not be changed, and the decedent died on or after May 1, 2009, without having regained competency to dispose of the decedent's property, or the decedent died within 90 days of the date that the decedent first regained competency on or after May 1, 2009, the present value of a remainder interest under this section is determined as if the valuation date with respect to the decedent's gross estate is either before or after May 1, 2009, at the option of the decedent's executor.

(ii) For purposes of sections 170, 2055, 2106, 2522, or 2624, in the case of trans-

fers to a charitable remainder unitrust for which the valuation date is on or after May 1, 2009, and before July 1, 2009, the present value of a remainder interest based on one or more measuring lives is determined under this section by use of the section 7520 interest rate for the month in which the valuation date occurs (see §§1.7520-1(b) and 1.7520-2(a)(2)) and the appropriate actuarial tables under either paragraph (e)(7) of this section or §1.664-4A(f)(6), at the option of the donor or the decedent's executor, as the case may be.

(iii) For purposes of paragraphs (e)(2)(i) and (e)(2)(ii) of this section, where the donor or decedent's executor is given the option to use the appropriate actuarial tables under either paragraph (e)(7) of this section or §1.664-4A(f)(6), the donor or decedent's executor must use the same actuarial table with respect to each individual transaction and with respect to all transfers occurring on the valuation date (for example, gift and income tax charitable deductions with respect to the same transfer must be determined based on the same tables, and all assets includible in the gross estate and/or estate tax deductions claimed must be valued based on the same tables).

(3) and (4) [Reserved] For further guidance, see §1.664-4(e)(3) and (e)(4).

(5) *Period is the life of one individual.* (i) If the period described in §1.664-3(a)(5) is the life of one individual, the factor that is used in determining the present value of the remainder interest for transfers for which the valuation date is on or after May 1, 2009, is the factor in Table U(1) in paragraph (e)(7)

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of this section under the appropriate adjusted payout. For purposes of the computations described in this paragraph (e)(5), the age of an individual is the age of that individual at the individual's nearest birthday. If the adjusted payout rate is an amount that is between adjusted payout rates for which factors are provided in the appropriate table, a linear interpolation must be made. The present value of the remainder interest is determined by multiplying the net fair market value (as of the valuation date as determined in §1.664-4(e)(4)) of the property placed in trust by the factor determined under this paragraph (e)(5). If the adjusted payout rate is between 4.2 and 14 percent, see paragraph (e)(7) of this section. If the adjusted payout rate is below 4.2 percent or greater than 14 percent, see §1.664-4(b).

(ii) The application of paragraph (e)(5)(i) of this section may be illustrated by the following example:

Example. A, who is 44 years and 11 months old, transfers \$100,000 to a charitable remainder unitrust on January 1st. The trust instrument requires that the trust pay to A semiannually (on June 30 and December 31) 8 percent of the fair market value of the trust assets as of January 1st during A's life. The section 7520 rate for January is 6.6 percent. Under Table F(6.6) in §1.664-4(e)(6), the appropriate adjustment factor is .953317 for semiannual payments payable at the end of the semiannual period. The adjusted payout rate is 7.627% (8% × .953317). Based on the remainder factors in Table U(1) in this section, the present value of the remainder interest is \$11,075.00, computed as follows:

Factor at 7.6 percent at age 4511141
Factor at 7.8 percent at age 4510653
Difference00488
Interpolation adjustment:	

$$\frac{7.627\% - 7.6\%}{0.2\%} = \frac{x}{.00488}$$

$$x = .00066$$

Factor at 7.6 percent at age 4511141
Less: Interpolation adjustment00066
Interpolated Factor11075
Present value of remainder interest:	
(\$100,000 × .11075)	\$11,075.00

(6) [Reserved] For further guidance, see §1.664-4(e)(6).

(7) *Actuarial Table U(1) for transfers for which the valuation date is on or after May 1, 2009.* For transfers for which the valuation date is on or after May 1, 2009, the present value of a charitable remainder unitrust interest that is dependent on the termination of a life interest is determined by using the section 7520 rate, Table U(1) in this paragraph (e)(7) and Table F(4.2) through (14.0) in §1.664-4(e)(6). See, however, §1.7520-3(b) (relating to exceptions to the use of prescribed tables under certain circumstances). Many actuarial factors not contained in the following tables are contained in Internal Revenue Service Publication 1458, "Actuarial Valuations Version 3B" (2009). This publication will be available beginning May 1, 2009, at no charge, electronically via the IRS Internet site at <http://www.irs.gov>.

Table U(1) - Unitrust Single Life Remainder Factors
Based on Life Table 2000CM
Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	5.8%	6.0%
0	.05527	.04953	.04455	.04023	.03648	.03321	.03037	.02789	.02573	.02383
1	.05095	.04501	.03986	.03538	.03148	.02809	.02513	.02255	.02029	.01831
2	.05269	.04659	.04128	.03666	.03264	.02913	.02606	.02338	.02103	.01896
3	.05468	.04841	.04295	.03818	.03403	.03040	.02722	.02443	.02199	.01984
4	.05684	.05039	.04477	.03986	.03557	.03181	.02852	.02563	.02309	.02085
5	.05912	.05251	.04672	.04166	.03723	.03335	.02993	.02694	.02429	.02197
6	.06154	.05475	.04880	.04359	.03901	.03500	.03146	.02835	.02561	.02319
7	.06407	.05709	.05097	.04561	.04089	.03673	.03308	.02985	.02700	.02448
8	.06672	.05956	.05328	.04775	.04288	.03859	.03481	.03146	.02850	.02588
9	.06951	.06217	.05571	.05002	.04500	.04057	.03665	.03319	.03012	.02739
10	.07244	.06491	.05827	.05241	.04724	.04266	.03861	.03503	.03184	.02901
11	.07550	.06778	.06096	.05494	.04961	.04489	.04070	.03698	.03368	.03074
12	.07869	.07078	.06378	.05759	.05210	.04723	.04290	.03906	.03563	.03258
13	.08199	.07389	.06670	.06034	.05468	.04966	.04519	.04121	.03767	.03450
14	.08536	.07706	.06969	.06315	.05733	.05215	.04754	.04342	.03975	.03646
15	.08877	.08027	.07271	.06599	.06000	.05467	.04990	.04565	.04184	.03844
16	.09221	.08351	.07576	.06885	.06269	.05719	.05228	.04788	.04394	.04041
17	.09570	.08679	.07885	.07176	.06542	.05975	.05468	.05014	.04606	.04240
18	.09925	.09014	.08199	.07471	.06820	.06236	.05712	.05243	.04821	.04442
19	.10289	.09356	.08522	.07774	.07104	.06503	.05963	.05478	.05041	.04648
20	.10665	.09711	.08856	.08089	.07400	.06781	.06224	.05723	.05272	.04864
21	.11052	.10077	.09201	.08413	.07706	.07068	.06495	.05977	.05510	.05088
22	.11452	.10455	.09558	.08750	.08023	.07367	.06776	.06241	.05759	.05322
23	.11867	.10848	.09929	.09101	.08354	.07680	.07070	.06519	.06019	.05567
24	.12300	.11259	.10319	.09470	.08703	.08009	.07381	.06812	.06297	.05829
25	.12755	.11691	.10730	.09860	.09073	.08359	.07713	.07126	.06593	.06109
26	.13232	.12146	.11163	.10272	.09464	.08731	.08065	.07460	.06910	.06409
27	.13732	.12624	.11619	.10706	.09878	.09125	.08440	.07816	.07248	.06731
28	.14255	.13125	.12098	.11164	.10315	.09542	.08837	.08195	.07609	.07074
29	.14799	.13647	.12598	.11644	.10773	.09980	.09256	.08594	.07990	.07438
30	.15365	.14191	.13120	.12144	.11252	.10438	.09694	.09014	.08391	.07821
31	.15952	.14756	.13664	.12666	.11754	.10919	.10155	.09455	.08813	.08225
32	.16561	.15343	.14230	.13210	.12277	.11422	.10637	.09918	.09257	.08650
33	.17193	.15954	.14819	.13778	.12824	.11948	.11143	.10403	.09724	.09098
34	.17845	.16585	.15429	.14367	.13391	.12495	.11670	.10910	.10211	.09566

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Table U(1) - Unitrust Single Life Remainder Factors
Based on Life Table 2000CM
Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	5.8%	6.0%
35	.18520	.17239	.16062	.14979	.13982	.13065	.12219	.11440	.10721	.10057
36	.19218	.17916	.16718	.15614	.14597	.13659	.12793	.11993	.11254	.10571
37	.19938	.18617	.17398	.16274	.15236	.14276	.13390	.12570	.11812	.11110
38	.20683	.19342	.18103	.16958	.15900	.14920	.14013	.13173	.12395	.11673
39	.21450	.20090	.18832	.17667	.16588	.15588	.14661	.13801	.13003	.12261
40	.22241	.20862	.19585	.18400	.17301	.16281	.15334	.14454	.13636	.12875
41	.23055	.21659	.20362	.19158	.18040	.17000	.16033	.15133	.14295	.13514
42	.23892	.22479	.21164	.19942	.18804	.17744	.16757	.15838	.14980	.14180
43	.24756	.23326	.21994	.20753	.19596	.18517	.17511	.16572	.15695	.14875
44	.25644	.24198	.22849	.21590	.20415	.19318	.18293	.17334	.16438	.15599
45	.26557	.25096	.23731	.22455	.21263	.20147	.19103	.18125	.17210	.16352
46	.27496	.26021	.24641	.23349	.22139	.21006	.19943	.18947	.18013	.17136
47	.28460	.26972	.25578	.24270	.23044	.21893	.20813	.19799	.18846	.17951
48	.29451	.27950	.26542	.25220	.23978	.22811	.21714	.20682	.19712	.18798
49	.30468	.28957	.27536	.26201	.24944	.23761	.22648	.21599	.20611	.19679
50	.31515	.29994	.28562	.27214	.25943	.24746	.23617	.22552	.21547	.20598
51	.32591	.31062	.29620	.28260	.26976	.25765	.24621	.23541	.22520	.21554
52	.33697	.32161	.30710	.29340	.28045	.26821	.25663	.24568	.23531	.22550
53	.34832	.33291	.31833	.30453	.29148	.27912	.26741	.25632	.24582	.23585
54	.35995	.34449	.32985	.31598	.30283	.29037	.27855	.26733	.25669	.24658
55	.37183	.35635	.34166	.32773	.31450	.30194	.29001	.27868	.26791	.25768
56	.38390	.36841	.35370	.33971	.32642	.31378	.30175	.29032	.27943	.26907
57	.39618	.38069	.36596	.35194	.33859	.32588	.31377	.30224	.29125	.28077
58	.40862	.39316	.37842	.36438	.35099	.33822	.32605	.31443	.30334	.29276
59	.42126	.40583	.39110	.37705	.36364	.35083	.33859	.32691	.31574	.30506
60	.43410	.41873	.40403	.38999	.37656	.36372	.35145	.33970	.32846	.31770
61	.44714	.43183	.41718	.40316	.38974	.37689	.36458	.35279	.34149	.33067
62	.46033	.44510	.43052	.41653	.40313	.39028	.37796	.36614	.35480	.34391
63	.47366	.45853	.44402	.43010	.41673	.40390	.39157	.37974	.36836	.35744
64	.48712	.47212	.45770	.44385	.43053	.41773	.40542	.39358	.38219	.37123
65	.50073	.48586	.47156	.45779	.44454	.43179	.41951	.40768	.39629	.38531
66	.51461	.49990	.48573	.47207	.45891	.44623	.43400	.42220	.41083	.39985
67	.52872	.51419	.50018	.48665	.47360	.46100	.44884	.43710	.42576	.41481
68	.54302	.52869	.51484	.50147	.48854	.47605	.46398	.45231	.44103	.43011
69	.55744	.54333	.52968	.51648	.50371	.49134	.47938	.46780	.45659	.44573
70	.57198	.55810	.54467	.53165	.51905	.50683	.49500	.48352	.47241	.46163

Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	4.2%	4.4%	4.6%	4.8%	5.0%	5.2%	5.4%	5.6%	5.8%	6.0%
71	.58662	.57300	.55980	.54700	.53458	.52253	.51084	.49950	.48849	.47781
72	.60134	.58800	.57505	.56247	.55026	.53840	.52688	.51569	.50481	.49425
73	.61608	.60303	.59035	.57803	.56604	.55439	.54305	.53203	.52131	.51087
74	.63077	.61804	.60565	.59358	.58184	.57041	.55928	.54844	.53789	.52761
75	.64536	.63295	.62085	.60907	.59759	.58639	.57548	.56485	.55447	.54436
76	.65980	.64772	.63594	.62445	.61323	.60229	.59162	.58120	.57102	.56110
77	.67408	.66234	.65089	.63970	.62877	.61809	.60766	.59747	.58751	.57779
78	.68817	.67679	.66567	.65479	.64416	.63376	.62359	.61364	.60392	.59440
79	.70205	.69104	.68026	.66971	.65938	.64927	.63937	.62968	.62019	.61090
80	.71569	.70504	.69461	.68439	.67438	.66457	.65495	.64553	.63629	.62724
81	.72905	.71878	.70871	.69883	.68914	.67963	.67031	.66116	.65219	.64339
82	.74213	.73224	.72252	.71299	.70363	.69444	.68541	.67655	.66785	.65930
83	.75489	.74538	.73603	.72684	.71781	.70894	.70022	.69165	.68323	.67495
84	.76731	.75818	.74919	.74036	.73167	.72312	.71471	.70644	.69830	.69029
85	.77937	.77062	.76200	.75352	.74516	.73694	.72884	.72087	.71302	.70529
86	.79106	.78268	.77443	.76629	.75828	.75038	.74260	.73493	.72738	.71993
87	.80235	.79434	.78645	.77866	.77098	.76341	.75595	.74858	.74132	.73416
88	.81324	.80560	.79806	.79062	.78328	.77603	.76888	.76182	.75486	.74798
89	.82371	.81643	.80924	.80214	.79513	.78821	.78137	.77461	.76794	.76134
90	.83375	.82682	.81998	.81321	.80653	.79992	.79339	.78693	.78055	.77424
91	.84336	.83678	.83027	.82383	.81747	.81117	.80494	.79878	.79268	.78665
92	.85253	.84629	.84011	.83399	.82794	.82194	.81601	.81014	.80433	.79857
93	.86126	.85534	.84948	.84367	.83792	.83222	.82658	.82099	.81545	.80997
94	.86956	.86395	.85840	.85289	.84743	.84202	.83666	.83134	.82608	.82086
95	.87744	.87213	.86687	.86166	.85648	.85135	.84626	.84122	.83621	.83125
96	.88487	.87985	.87488	.86994	.86504	.86017	.85535	.85056	.84581	.84109
97	.89188	.88714	.88244	.87776	.87312	.86852	.86395	.85941	.85490	.85042
98	.89850	.89402	.88958	.88516	.88077	.87641	.87208	.86778	.86351	.85927
99	.90475	.90053	.89632	.89215	.88800	.88388	.87978	.87571	.87167	.86765
100	.91057	.90658	.90261	.89867	.89475	.89085	.88697	.88312	.87929	.87548
101	.91610	.91234	.90860	.90487	.90117	.89749	.89382	.89018	.88655	.88295
102	.92122	.91767	.91413	.91061	.90711	.90363	.90017	.89672	.89328	.88987
103	.92630	.92296	.91963	.91632	.91303	.90975	.90648	.90323	.89999	.89677
104	.93097	.92783	.92470	.92158	.91847	.91537	.91229	.90922	.90616	.90312
105	.93558	.93263	.92969	.92676	.92383	.92092	.91802	.91513	.91225	.90938
106	.94135	.93864	.93594	.93325	.93057	.92789	.92522	.92256	.91991	.91726
107	.94789	.94546	.94304	.94062	.93821	.93580	.93340	.93101	.92861	.92623
108	.95844	.95648	.95453	.95258	.95063	.94868	.94673	.94478	.94284	.94090
109	.97900	.97800	.97700	.97600	.97500	.97400	.97300	.97200	.97100	.97000

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Table U(1) - Unitrust Single Life Remainder Factors
Based on Life Table 2000CM
Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
0	.02217	.02071	.01942	.01829	.01729	.01640	.01561	.01491	.01429	.01373
1	.01657	.01504	.01369	.01250	.01145	.01053	.00970	.00897	.00831	.00773
2	.01715	.01555	.01415	.01290	.01180	.01082	.00996	.00918	.00850	.00788
3	.01795	.01628	.01481	.01350	.01235	.01132	.01041	.00960	.00887	.00822
4	.01888	.01714	.01560	.01423	.01302	.01194	.01098	.01013	.00936	.00867
5	.01991	.01809	.01648	.01505	.01378	.01265	.01164	.01074	.00993	.00921
6	.02104	.01914	.01746	.01597	.01463	.01345	.01239	.01144	.01059	.00982
7	.02225	.02027	.01851	.01695	.01555	.01430	.01319	.01219	.01130	.01049
8	.02356	.02149	.01965	.01802	.01656	.01525	.01408	.01303	.01209	.01124
9	.02497	.02282	.02090	.01919	.01766	.01629	.01506	.01396	.01296	.01207
10	.02649	.02425	.02224	.02046	.01885	.01742	.01613	.01497	.01392	.01298
11	.02812	.02578	.02369	.02182	.02015	.01865	.01729	.01608	.01498	.01398
12	.02986	.02742	.02525	.02329	.02154	.01997	.01855	.01727	.01612	.01508
13	.03167	.02914	.02687	.02483	.02300	.02135	.01987	.01853	.01732	.01622
14	.03352	.03089	.02852	.02640	.02449	.02276	.02121	.01981	.01854	.01738
15	.03538	.03264	.03018	.02797	.02597	.02417	.02255	.02107	.01974	.01853
16	.03724	.03439	.03183	.02952	.02744	.02556	.02385	.02231	.02092	.01965
17	.03911	.03615	.03348	.03107	.02890	.02694	.02516	.02354	.02208	.02075
18	.04100	.03792	.03515	.03264	.03037	.02832	.02646	.02477	.02323	.02184
19	.04294	.03974	.03685	.03424	.03188	.02973	.02778	.02602	.02441	.02294
20	.04497	.04165	.03864	.03592	.03345	.03121	.02918	.02732	.02564	.02410
21	.04707	.04362	.04049	.03766	.03508	.03275	.03062	.02868	.02691	.02530
22	.04926	.04568	.04243	.03948	.03679	.03435	.03212	.03009	.02824	.02655
23	.05157	.04785	.04447	.04140	.03860	.03605	.03372	.03160	.02965	.02788
24	.05404	.05017	.04666	.04346	.04054	.03788	.03545	.03322	.03119	.02932
25	.05668	.05268	.04902	.04569	.04265	.03987	.03733	.03500	.03287	.03091
26	.05953	.05537	.05157	.04811	.04494	.04204	.03938	.03695	.03472	.03267
27	.06258	.05827	.05433	.05072	.04742	.04440	.04163	.03908	.03674	.03459
28	.06585	.06138	.05729	.05354	.05011	.04695	.04406	.04140	.03895	.03670
29	.06932	.06469	.06044	.05655	.05297	.04969	.04667	.04389	.04132	.03896
30	.07298	.06818	.06378	.05974	.05602	.05260	.04944	.04654	.04386	.04139
31	.07684	.07188	.06732	.06312	.05925	.05569	.05241	.04937	.04657	.04399
32	.08092	.07578	.07106	.06670	.06268	.05898	.05556	.05239	.04947	.04676
33	.08522	.07991	.07501	.07050	.06633	.06247	.05891	.05561	.05256	.04972
34	.08972	.08423	.07917	.07449	.07016	.06615	.06244	.05901	.05582	.05286

Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
35	.09444	.08878	.08354	.07869	.07420	.07004	.06618	.06260	.05928	.05619
36	.09940	.09355	.08814	.08312	.07846	.07415	.07013	.06641	.06294	.05972
37	.10459	.09856	.09297	.08777	.08295	.07847	.07431	.07043	.06682	.06346
38	.11004	.10382	.09805	.09268	.08769	.08304	.07872	.07469	.07093	.06742
39	.11573	.10932	.10337	.09782	.09266	.08784	.08336	.07917	.07526	.07161
40	.12167	.11508	.10893	.10321	.09787	.09289	.08824	.08389	.07982	.07602
41	.12787	.12109	.11476	.10885	.10334	.09818	.09336	.08885	.08463	.08068
42	.13433	.12736	.12085	.11476	.10906	.10373	.09874	.09406	.08968	.08557
43	.14109	.13393	.12723	.12095	.11508	.10957	.10441	.09957	.09502	.09075
44	.14814	.14078	.13389	.12744	.12138	.11569	.11036	.10534	.10063	.09620
45	.15548	.14793	.14086	.13421	.12797	.12211	.11659	.11141	.10653	.10193
46	.16313	.15540	.14814	.14131	.13488	.12884	.12315	.11779	.11274	.10798
47	.17109	.16318	.15573	.14871	.14210	.13588	.13001	.12448	.11925	.11432
48	.17938	.17128	.16364	.15645	.14966	.14325	.13721	.13150	.12610	.12100
49	.18801	.17973	.17191	.16453	.15756	.15098	.14475	.13887	.13330	.12803
50	.19702	.18856	.18057	.17301	.16586	.15910	.15270	.14663	.14089	.13545
51	.20642	.19778	.18961	.18188	.17456	.16762	.16104	.15480	.14889	.14328
52	.21621	.20741	.19907	.19117	.18367	.17656	.16981	.16340	.15732	.15153
53	.22641	.21745	.20894	.20087	.19321	.18593	.17901	.17243	.16617	.16022
54	.23699	.22788	.21922	.21098	.20316	.19571	.18862	.18188	.17546	.16934
55	.24794	.23868	.22987	.22148	.21350	.20589	.19865	.19174	.18516	.17888
56	.25920	.24981	.24085	.23232	.22418	.21642	.20902	.20195	.19521	.18877
57	.27078	.26126	.25217	.24349	.23521	.22730	.21975	.21253	.20563	.19904
58	.28266	.27301	.26379	.25498	.24656	.23851	.23081	.22345	.21640	.20965
59	.29486	.28510	.27576	.26682	.25827	.25009	.24225	.23474	.22755	.22065
60	.30740	.29754	.28810	.27905	.27037	.26206	.25409	.24645	.23911	.23208
61	.32029	.31033	.30079	.29164	.28285	.27442	.26632	.25855	.25109	.24391
62	.33347	.32344	.31381	.30455	.29567	.28712	.27891	.27102	.26343	.25613
63	.34693	.33684	.32713	.31779	.30881	.30017	.29185	.28385	.27614	.26872
64	.36069	.35054	.34076	.33135	.32229	.31356	.30515	.29704	.28922	.28169
65	.37474	.36455	.35472	.34525	.33612	.32731	.31881	.31061	.30270	.29506
66	.38927	.37905	.36919	.35968	.35049	.34161	.33304	.32476	.31676	.30903
67	.40423	.39401	.38413	.37458	.36535	.35643	.34780	.33946	.33138	.32357
68	.41956	.40935	.39947	.38991	.38066	.37170	.36303	.35464	.34650	.33863
69	.43522	.42504	.41518	.40562	.39636	.38739	.37869	.37026	.36208	.35415
70	.45118	.44104	.43121	.42168	.41243	.40346	.39475	.38629	.37809	.37012

Internal Revenue Service, Treasury

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Table U(1) - Unitrust Single Life Remainder Factors
Based on Life Table 2000CM
Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	6.2%	6.4%	6.6%	6.8%	7.0%	7.2%	7.4%	7.6%	7.8%	8.0%
71	.46744	.45737	.44759	.43810	.42888	.41992	.41122	.40276	.39455	.38656
72	.48398	.47399	.46429	.45486	.44568	.43676	.42808	.41964	.41143	.40344
73	.50072	.49084	.48123	.47187	.46276	.45389	.44526	.43685	.42866	.42068
74	.51759	.50784	.49833	.48907	.48004	.47124	.46267	.45431	.44616	.43821
75	.53450	.52488	.51550	.50635	.49743	.48872	.48022	.47192	.46383	.45592
76	.55140	.54194	.53270	.52368	.51487	.50626	.49785	.48964	.48161	.47377
77	.56828	.55898	.54990	.54102	.53234	.52385	.51555	.50744	.49950	.49173
78	.58509	.57598	.56707	.55835	.54981	.54146	.53328	.52528	.51744	.50977
79	.60181	.59290	.58417	.57562	.56725	.55904	.55100	.54313	.53541	.52785
80	.61837	.60967	.60114	.59278	.58458	.57653	.56865	.56091	.55333	.54589
81	.63475	.62627	.61795	.60979	.60177	.59391	.58619	.57861	.57117	.56386
82	.65091	.64267	.63457	.62661	.61880	.61112	.60358	.59617	.58888	.58173
83	.66681	.65881	.65094	.64321	.63560	.62812	.62077	.61353	.60642	.59942
84	.68241	.67466	.66703	.65952	.65214	.64487	.63771	.63067	.62373	.61691
85	.69768	.69019	.68280	.67553	.66837	.66132	.65437	.64753	.64078	.63414
86	.71259	.70536	.69822	.69120	.68427	.67744	.67070	.66406	.65752	.65107
87	.72709	.72012	.71325	.70647	.69977	.69317	.68666	.68023	.67389	.66764
88	.74119	.73449	.72787	.72134	.71489	.70852	.70223	.69602	.68989	.68384
89	.75483	.74840	.74204	.73576	.72955	.72342	.71736	.71138	.70546	.69962
90	.76800	.76183	.75573	.74971	.74375	.73785	.73202	.72626	.72056	.71493
91	.78069	.77479	.76895	.76317	.75745	.75180	.74620	.74067	.73519	.72977
92	.79288	.78724	.78165	.77613	.77065	.76524	.75987	.75456	.74930	.74409
93	.80453	.79915	.79382	.78854	.78331	.77812	.77299	.76790	.76286	.75787
94	.81568	.81055	.80547	.80043	.79544	.79048	.78557	.78071	.77588	.77110
95	.82633	.82144	.81660	.81180	.80704	.80231	.79763	.79298	.78837	.78380
96	.83642	.83177	.82717	.82259	.81806	.81356	.80909	.80465	.80025	.79588
97	.84598	.84157	.83719	.83284	.82853	.82424	.81998	.81576	.81156	.80739
98	.85505	.85086	.84670	.84257	.83847	.83439	.83034	.82631	.82232	.81835
99	.86365	.85968	.85573	.85181	.84791	.84404	.84019	.83636	.83255	.82877
100	.87169	.86792	.86418	.86045	.85675	.85307	.84941	.84577	.84215	.83855
101	.87936	.87579	.87224	.86871	.86520	.86171	.85823	.85477	.85133	.84791
102	.88647	.88309	.87972	.87637	.87304	.86972	.86642	.86313	.85986	.85660
103	.89356	.89036	.88718	.88402	.88086	.87772	.87460	.87149	.86839	.86531
104	.90008	.89706	.89405	.89105	.88807	.88509	.88213	.87918	.87624	.87331
105	.90652	.90366	.90082	.89799	.89517	.89236	.88955	.88676	.88398	.88120
106	.91462	.91199	.90937	.90675	.90414	.90154	.89895	.89636	.89378	.89121
107	.92285	.92147	.91910	.91673	.91437	.91201	.90966	.90731	.90497	.90263
108	.93896	.93702	.93509	.93316	.93123	.92930	.92737	.92544	.92352	.92160
109	.96900	.96800	.96700	.96600	.96500	.96400	.96300	.96200	.96100	.96000

Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
0	.01323	.01279	.01238	.01202	.01169	.01139	.01112	.01088	.01065	.01044
1	.00721	.00674	.00632	.00594	.00559	.00528	.00500	.00474	.00451	.00430
2	.00733	.00683	.00639	.00598	.00562	.00529	.00499	.00472	.00447	.00425
3	.00764	.00711	.00664	.00622	.00583	.00548	.00516	.00487	.00461	.00437
4	.00806	.00750	.00700	.00655	.00614	.00577	.00543	.00513	.00485	.00459
5	.00856	.00797	.00744	.00696	.00653	.00614	.00578	.00545	.00515	.00488
6	.00914	.00852	.00795	.00745	.00699	.00657	.00619	.00584	.00552	.00523
7	.00976	.00911	.00851	.00798	.00749	.00704	.00664	.00627	.00593	.00562
8	.01047	.00978	.00915	.00858	.00806	.00759	.00716	.00677	.00640	.00607
9	.01126	.01053	.00986	.00926	.00871	.00821	.00775	.00734	.00695	.00660
10	.01213	.01136	.01065	.01002	.00944	.00891	.00842	.00798	.00757	.00720
11	.01309	.01227	.01153	.01086	.01024	.00968	.00917	.00870	.00827	.00787
12	.01413	.01327	.01249	.01178	.01113	.01054	.00999	.00950	.00904	.00862
13	.01523	.01432	.01350	.01275	.01206	.01144	.01086	.01034	.00985	.00940
14	.01634	.01539	.01452	.01373	.01301	.01235	.01174	.01118	.01067	.01020
15	.01743	.01643	.01552	.01469	.01393	.01323	.01259	.01200	.01146	.01096
16	.01849	.01744	.01648	.01561	.01480	.01407	.01339	.01277	.01220	.01167
17	.01953	.01843	.01742	.01650	.01565	.01488	.01416	.01351	.01290	.01235
18	.02056	.01940	.01834	.01737	.01648	.01566	.01491	.01422	.01358	.01299
19	.02160	.02038	.01927	.01824	.01730	.01644	.01565	.01492	.01424	.01362
20	.02270	.02141	.02024	.01916	.01817	.01726	.01642	.01565	.01494	.01428
21	.02382	.02247	.02124	.02010	.01906	.01810	.01721	.01640	.01565	.01495
22	.02500	.02358	.02228	.02108	.01998	.01897	.01803	.01717	.01638	.01564
23	.02625	.02476	.02339	.02213	.02097	.01990	.01891	.01800	.01716	.01638
24	.02761	.02604	.02460	.02327	.02205	.02092	.01988	.01891	.01802	.01719
25	.02912	.02747	.02595	.02455	.02326	.02206	.02096	.01994	.01900	.01812
26	.03078	.02904	.02744	.02597	.02461	.02335	.02218	.02110	.02010	.01917
27	.03261	.03079	.02910	.02755	.02611	.02478	.02355	.02241	.02135	.02037
28	.03462	.03270	.03093	.02929	.02778	.02637	.02507	.02387	.02274	.02170
29	.03678	.03477	.03291	.03118	.02959	.02811	.02673	.02546	.02427	.02316
30	.03910	.03699	.03503	.03322	.03154	.02997	.02852	.02717	.02592	.02475
31	.04159	.03937	.03731	.03541	.03364	.03199	.03046	.02903	.02770	.02646
32	.04425	.04192	.03976	.03776	.03589	.03416	.03254	.03104	.02963	.02832
33	.04710	.04466	.04239	.04029	.03832	.03650	.03479	.03320	.03172	.03033
34	.05011	.04756	.04518	.04297	.04090	.03898	.03718	.03551	.03394	.03247

Internal Revenue Service, Treasury

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Table U(1) - Unitrust Single Life Remainder Factors
Based on Life Table 2000CM
Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
35	.05331	.05064	.04815	.04582	.04366	.04163	.03974	.03798	.03632	.03477
36	.05671	.05391	.05130	.04887	.04659	.04446	.04247	.04061	.03887	.03723
37	.06032	.05739	.05466	.05210	.04972	.04748	.04539	.04343	.04159	.03986
38	.06415	.06109	.05823	.05556	.05305	.05070	.04850	.04644	.04450	.04268
39	.06819	.06500	.06201	.05921	.05658	.05412	.05181	.04964	.04760	.04568
40	.07246	.06913	.06601	.06308	.06033	.05774	.05532	.05304	.05089	.04887
41	.07697	.07349	.07023	.06717	.06429	.06158	.05904	.05664	.05439	.05226
42	.08171	.07809	.07469	.07149	.06848	.06564	.06298	.06046	.05809	.05585
43	.08674	.08297	.07942	.07608	.07293	.06997	.06717	.06453	.06204	.05969
44	.09203	.08810	.08441	.08092	.07764	.07454	.07161	.06885	.06624	.06377
45	.09760	.09352	.08967	.08604	.08261	.07938	.07632	.07342	.07068	.06809
46	.10348	.09925	.09524	.09146	.08789	.08451	.08131	.07828	.07542	.07270
47	.10967	.10527	.10111	.09717	.09345	.08992	.08659	.08342	.08042	.07757
48	.11618	.11161	.10730	.10321	.09933	.09566	.09217	.08887	.08573	.08275
49	.12304	.11831	.11383	.10958	.10555	.10173	.09810	.09465	.09137	.08825
50	.13029	.12540	.12076	.11635	.11216	.10818	.10440	.10081	.09739	.09413
51	.13795	.13289	.12808	.12351	.11917	.11504	.11110	.10736	.10379	.10040
52	.14604	.14081	.13584	.13111	.12661	.12232	.11823	.11434	.11062	.10708
53	.15456	.14917	.14404	.13914	.13448	.13004	.12580	.12175	.11789	.11420
54	.16352	.15796	.15266	.14761	.14279	.13819	.13379	.12959	.12558	.12175
55	.17289	.16717	.16171	.15650	.15152	.14676	.14221	.13786	.13370	.12971
56	.18262	.17674	.17113	.16576	.16062	.15570	.15100	.14650	.14218	.13805
57	.19273	.18669	.18092	.17539	.17010	.16503	.16017	.15552	.15105	.14677
58	.20319	.19700	.19107	.18539	.17994	.17472	.16971	.16490	.16029	.15586
59	.21404	.20770	.20162	.19579	.19019	.18481	.17965	.17470	.16993	.16535
60	.22532	.21884	.21261	.20663	.20088	.19536	.19005	.18494	.18003	.17530
61	.23702	.23040	.22403	.21790	.21201	.20634	.20089	.19564	.19058	.18571
62	.24911	.24235	.23584	.22958	.22355	.21774	.21214	.20674	.20154	.19653
63	.26157	.25468	.24805	.24165	.23548	.22954	.22380	.21827	.21293	.20777
64	.27442	.26742	.26065	.25413	.24783	.24175	.23588	.23021	.22474	.21944
65	.28768	.28056	.27368	.26703	.26061	.25441	.24841	.24261	.23700	.23158
66	.30156	.29433	.28735	.28059	.27405	.26773	.26161	.25569	.24995	.24440
67	.31601	.30870	.30161	.29476	.28812	.28169	.27545	.26942	.26357	.25790
68	.33100	.32360	.31643	.30949	.30275	.29622	.28989	.28375	.27779	.27201
69	.34646	.33900	.33177	.32474	.31793	.31131	.30489	.29865	.29259	.28671
70	.36239	.35488	.34758	.34049	.33361	.32692	.32041	.31409	.30795	.30197

Table U(1) - Unitrust Single Life Remainder Factors
Based on Life Table 2000CM
Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	8.2%	8.4%	8.6%	8.8%	9.0%	9.2%	9.4%	9.6%	9.8%	10.0%
71	.37880	.37125	.36391	.35677	.34983	.34308	.33651	.33011	.32389	.31784
72	.39566	.38809	.38073	.37355	.36657	.35977	.35315	.34670	.34041	.33429
73	.41291	.40534	.39796	.39077	.38376	.37693	.37027	.36377	.35744	.35126
74	.43046	.42290	.41552	.40833	.40131	.39446	.38778	.38125	.37489	.36867
75	.44821	.44068	.43332	.42614	.41913	.41227	.40558	.39904	.39266	.38641
76	.46611	.45862	.45130	.44415	.43715	.43031	.42363	.41709	.41069	.40444
77	.48414	.47671	.46944	.46233	.45537	.44856	.44189	.43536	.42898	.42272
78	.50226	.49490	.48770	.48065	.47374	.46697	.46034	.45384	.44747	.44123
79	.52043	.51317	.50604	.49906	.49222	.48551	.47892	.47247	.46614	.45993
80	.53859	.53142	.52440	.51750	.51074	.50410	.49758	.49118	.48491	.47874
81	.55669	.54964	.54273	.53593	.52926	.52271	.51627	.50995	.50373	.49763
82	.57469	.56778	.56099	.55431	.54774	.54129	.53494	.52871	.52257	.51654
83	.59254	.58577	.57911	.57256	.56612	.55978	.55354	.54740	.54136	.53541
84	.61019	.60358	.59706	.59065	.58434	.57812	.57200	.56597	.56003	.55419
85	.62759	.62114	.61479	.60853	.60236	.59628	.59028	.58438	.57856	.57282
86	.64470	.63843	.63224	.62614	.62012	.61419	.60833	.60256	.59687	.59125
87	.66146	.65537	.64936	.64342	.63757	.63179	.62608	.62045	.61489	.60941
88	.67786	.67196	.66613	.66037	.65469	.64907	.64352	.63804	.63263	.62728
89	.69384	.68813	.68249	.67691	.67140	.66595	.66057	.65525	.64999	.64479
90	.70936	.70385	.69840	.69301	.68768	.68241	.67719	.67204	.66693	.66189
91	.72440	.71909	.71384	.70864	.70349	.69840	.69336	.68837	.68344	.67855
92	.73894	.73383	.72878	.72377	.71881	.71390	.70904	.70422	.69945	.69473
93	.75292	.74801	.74316	.73834	.73357	.72885	.72416	.71952	.71492	.71037
94	.76636	.76166	.75700	.75238	.74780	.74326	.73876	.73429	.72986	.72547
95	.77926	.77476	.77030	.76587	.76148	.75712	.75280	.74851	.74426	.74004
96	.79155	.78725	.78298	.77874	.77453	.77036	.76622	.76210	.75802	.75397
97	.80325	.79915	.79507	.79101	.78699	.78300	.77903	.77509	.77117	.76729
98	.81440	.81048	.80659	.80272	.79887	.79505	.79126	.78749	.78375	.78002
99	.82502	.82128	.81757	.81388	.81021	.80656	.80294	.79934	.79576	.79220
100	.83497	.83141	.82788	.82436	.82086	.81738	.81392	.81048	.80706	.80365
101	.84451	.84112	.83776	.83441	.83107	.82776	.82446	.82117	.81791	.81466
102	.85337	.85014	.84693	.84374	.84056	.83740	.83425	.83112	.82800	.82490
103	.86223	.85918	.85613	.85310	.85008	.84708	.84409	.84111	.83814	.83519
104	.87040	.86749	.86460	.86172	.85885	.85599	.85314	.85030	.84748	.84466
105	.87844	.87568	.87294	.87020	.86748	.86476	.86205	.85935	.85666	.85398
106	.88865	.88609	.88354	.88100	.87846	.87594	.87341	.87090	.86839	.86590
107	.90030	.89797	.89565	.89333	.89102	.88871	.88641	.88411	.88181	.87952
108	.91968	.91776	.91585	.91394	.91203	.91012	.90821	.90630	.90440	.90250
109	.95900	.95800	.95700	.95600	.95500	.95400	.95300	.95200	.95100	.95000

Internal Revenue Service, Treasury

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Table U(1) - Unitrust Single Life Remainder Factors
Based on Life Table 2000CM
Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
0	.01025	.01008	.00992	.00977	.00963	.00950	.00938	.00927	.00917	.00907
1	.00410	.00392	.00376	.00361	.00347	.00334	.00322	.00310	.00300	.00290
2	.00404	.00385	.00367	.00351	.00336	.00322	.00310	.00298	.00287	.00276
3	.00415	.00394	.00376	.00359	.00343	.00328	.00314	.00301	.00290	.00279
4	.00435	.00414	.00394	.00375	.00358	.00342	.00328	.00314	.00302	.00290
5	.00463	.00439	.00418	.00398	.00380	.00363	.00348	.00333	.00319	.00307
6	.00496	.00471	.00448	.00427	.00408	.00390	.00373	.00357	.00343	.00329
7	.00533	.00507	.00483	.00460	.00439	.00420	.00402	.00385	.00369	.00355
8	.00577	.00549	.00523	.00499	.00476	.00456	.00436	.00418	.00402	.00386
9	.00627	.00598	.00570	.00544	.00520	.00498	.00478	.00458	.00440	.00423
10	.00685	.00653	.00624	.00596	.00571	.00547	.00525	.00505	.00485	.00467
11	.00750	.00716	.00685	.00656	.00629	.00603	.00580	.00558	.00537	.00518
12	.00823	.00787	.00753	.00722	.00693	.00667	.00642	.00618	.00596	.00576
13	.00899	.00861	.00826	.00793	.00762	.00734	.00707	.00682	.00659	.00637
14	.00976	.00935	.00898	.00863	.00831	.00801	.00772	.00746	.00722	.00698
15	.01050	.01007	.00967	.00931	.00896	.00864	.00835	.00807	.00781	.00756
16	.01118	.01073	.01031	.00992	.00956	.00922	.00891	.00861	.00834	.00808
17	.01183	.01135	.01091	.01050	.01011	.00976	.00942	.00911	.00882	.00855
18	.01244	.01194	.01147	.01104	.01063	.01025	.00990	.00957	.00926	.00897
19	.01304	.01251	.01202	.01156	.01113	.01073	.01035	.01001	.00968	.00937
20	.01367	.01311	.01258	.01209	.01164	.01122	.01082	.01045	.01011	.00978
21	.01430	.01371	.01315	.01263	.01215	.01171	.01129	.01090	.01053	.01019
22	.01496	.01432	.01373	.01319	.01268	.01220	.01176	.01134	.01095	.01059
23	.01565	.01498	.01436	.01377	.01323	.01273	.01225	.01181	.01140	.01101
24	.01642	.01571	.01505	.01443	.01386	.01332	.01282	.01235	.01191	.01149
25	.01731	.01655	.01585	.01519	.01458	.01401	.01347	.01297	.01250	.01206
26	.01831	.01751	.01676	.01606	.01541	.01480	.01423	.01370	.01320	.01273
27	.01945	.01860	.01780	.01706	.01637	.01572	.01511	.01454	.01401	.01351
28	.02073	.01982	.01898	.01819	.01745	.01676	.01611	.01551	.01494	.01440
29	.02213	.02117	.02027	.01943	.01865	.01791	.01722	.01658	.01597	.01540
30	.02365	.02263	.02168	.02079	.01995	.01917	.01844	.01775	.01710	.01649
31	.02531	.02422	.02321	.02226	.02138	.02054	.01976	.01902	.01833	.01768
32	.02709	.02595	.02487	.02387	.02292	.02204	.02120	.02042	.01968	.01899
33	.02903	.02782	.02668	.02561	.02461	.02366	.02278	.02194	.02116	.02041
34	.03110	.02981	.02860	.02747	.02640	.02540	.02446	.02357	.02273	.02194

Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
35	.03332	.03195	.03067	.02947	.02834	.02728	.02627	.02533	.02444	.02359
36	.03569	.03425	.03290	.03162	.03042	.02929	.02823	.02722	.02627	.02537
37	.03824	.03671	.03528	.03393	.03266	.03146	.03032	.02925	.02824	.02729
38	.04097	.03936	.03784	.03641	.03506	.03379	.03259	.03145	.03037	.02936
39	.04387	.04217	.04057	.03905	.03763	.03628	.03500	.03380	.03265	.03157
40	.04696	.04517	.04347	.04187	.04036	.03893	.03758	.03630	.03509	.03394
41	.05025	.04836	.04657	.04488	.04328	.04177	.04034	.03898	.03769	.03647
42	.05374	.05174	.04986	.04807	.04638	.04478	.04326	.04183	.04046	.03917
43	.05747	.05537	.05338	.05150	.04971	.04802	.04641	.04489	.04344	.04207
44	.06143	.05922	.05712	.05514	.05325	.05147	.04977	.04816	.04663	.04517
45	.06564	.06331	.06111	.05901	.05703	.05514	.05335	.05164	.05002	.04848
46	.07012	.06768	.06536	.06315	.06106	.05907	.05718	.05538	.05366	.05203
47	.07487	.07231	.06987	.06755	.06535	.06325	.06125	.05935	.05754	.05581
48	.07992	.07723	.07467	.07223	.06991	.06770	.06560	.06359	.06168	.05985
49	.08529	.08247	.07978	.07722	.07479	.07246	.07024	.06813	.06611	.06418
50	.09103	.08808	.08526	.08258	.08002	.07757	.07524	.07301	.07088	.06885
51	.09716	.09407	.09112	.08831	.08562	.08306	.08060	.07826	.07601	.07387
52	.10370	.10047	.09739	.09445	.09163	.08894	.08637	.08390	.08154	.07928
53	.11068	.10731	.10409	.10101	.09806	.09524	.09254	.08996	.08748	.08510
54	.11808	.11457	.11121	.10800	.10492	.10197	.09914	.09642	.09382	.09133
55	.12590	.12225	.11875	.11540	.11218	.10910	.10614	.10330	.10057	.09795
56	.13409	.13029	.12665	.12316	.11981	.11659	.11350	.11053	.10768	.10493
57	.14266	.13872	.13494	.13130	.12781	.12446	.12123	.11813	.11515	.11228
58	.15160	.14751	.14359	.13981	.13618	.13269	.12933	.12609	.12298	.11998
59	.16095	.15672	.15264	.14873	.14495	.14132	.13783	.13446	.13121	.12808
60	.17076	.16638	.16216	.15810	.15419	.15042	.14678	.14328	.13990	.13663
61	.18101	.17649	.17213	.16793	.16388	.15997	.15619	.15255	.14904	.14564
62	.19169	.18703	.18253	.17818	.17399	.16994	.16603	.16225	.15860	.15507
63	.20279	.19799	.19335	.18886	.18453	.18034	.17629	.17238	.16859	.16493
64	.21433	.20939	.20461	.19998	.19551	.19119	.18700	.18295	.17903	.17523
65	.22633	.22125	.21633	.21158	.20697	.20251	.19819	.19400	.18994	.18601
66	.23903	.23382	.22877	.22388	.21914	.21455	.21010	.20578	.20159	.19752
67	.25240	.24707	.24190	.23688	.23202	.22730	.22271	.21827	.21395	.20975
68	.26640	.26095	.25566	.25053	.24554	.24070	.23600	.23143	.22698	.22267
69	.28099	.27544	.27004	.26480	.25970	.25474	.24992	.24523	.24067	.23623
70	.29616	.29051	.28501	.27966	.27446	.26939	.26446	.25966	.25499	.25044

Internal Revenue Service, Treasury

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Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	10.2%	10.4%	10.6%	10.8%	11.0%	11.2%	11.4%	11.6%	11.8%	12.0%
71	.31194	.30620	.30062	.29517	.28987	.28471	.27968	.27478	.27000	.26534
72	.32833	.32251	.31684	.31132	.30593	.30068	.29556	.29057	.28569	.28094
73	.34524	.33936	.33363	.32804	.32258	.31725	.31205	.30697	.30201	.29717
74	.36260	.35667	.35089	.34523	.33971	.33432	.32905	.32390	.31887	.31395
75	.38031	.37435	.36852	.36282	.35725	.35180	.34647	.34126	.33617	.33118
76	.39832	.39233	.38647	.38074	.37513	.36964	.36427	.35901	.35386	.34882
77	.41660	.41060	.40473	.39898	.39335	.38783	.38242	.37713	.37194	.36685
78	.43512	.42913	.42326	.41750	.41186	.40632	.40090	.39558	.39036	.38524
79	.45384	.44787	.44201	.43626	.43062	.42509	.41966	.41432	.40909	.40396
80	.47269	.46675	.46092	.45519	.44957	.44404	.43862	.43329	.42806	.42291
81	.49163	.48574	.47994	.47425	.46866	.46316	.45775	.45244	.44722	.44208
82	.51061	.50478	.49904	.49340	.48784	.48238	.47701	.47173	.46653	.46141
83	.52956	.52380	.51813	.51255	.50705	.50165	.49632	.49108	.48592	.48083
84	.54843	.54275	.53716	.53166	.52623	.52089	.51562	.51044	.50532	.50029
85	.56716	.56159	.55609	.55067	.54533	.54006	.53487	.52975	.52470	.51972
86	.58571	.58024	.57485	.56953	.56428	.55910	.55399	.54894	.54397	.53906
87	.60399	.59864	.59337	.58815	.58301	.57793	.57291	.56795	.56306	.55823
88	.62200	.61678	.61162	.60653	.60150	.59653	.59161	.58676	.58196	.57722
89	.63965	.63457	.62954	.62458	.61967	.61481	.61001	.60526	.60057	.59593
90	.65690	.65196	.64707	.64224	.63746	.63273	.62805	.62342	.61884	.61431
91	.67371	.66892	.66418	.65949	.65485	.65025	.64570	.64119	.63673	.63231
92	.69005	.68542	.68083	.67628	.67178	.66732	.66290	.65852	.65419	.64989
93	.70585	.70137	.69694	.69254	.68819	.68387	.67959	.67534	.67114	.66697
94	.72112	.71681	.71253	.70828	.70407	.69990	.69576	.69166	.68759	.68355
95	.73585	.73170	.72758	.72349	.71943	.71541	.71141	.70745	.70352	.69961
96	.74995	.74595	.74199	.73806	.73415	.73027	.72642	.72260	.71881	.71505
97	.76343	.75960	.75579	.75201	.74826	.74453	.74083	.73715	.73350	.72987
98	.77633	.77265	.76900	.76538	.76177	.75819	.75463	.75110	.74759	.74410
99	.78866	.78514	.78165	.77817	.77472	.77129	.76787	.76448	.76111	.75775
100	.80027	.79690	.79356	.79023	.78692	.78363	.78036	.77710	.77386	.77065
101	.81143	.80821	.80502	.80183	.79867	.79552	.79239	.78927	.78617	.78308
102	.82181	.81874	.81568	.81264	.80961	.80659	.80359	.80060	.79763	.79467
103	.83225	.82933	.82641	.82351	.82062	.81774	.81488	.81203	.80919	.80636
104	.84186	.83907	.83629	.83351	.83076	.82801	.82527	.82254	.81982	.81712
105	.85131	.84865	.84600	.84336	.84072	.83810	.83548	.83288	.83028	.82769
106	.86340	.86092	.85844	.85597	.85351	.85105	.84860	.84616	.84372	.84130
107	.87724	.87496	.87268	.87041	.86815	.86589	.86363	.86138	.85914	.85690
108	.90060	.89870	.89681	.89492	.89303	.89114	.88925	.88736	.88548	.88360
109	.94900	.94800	.94700	.94600	.94500	.94400	.94300	.94200	.94100	.94000

Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
0	.00898	.00889	.00881	.00873	.00866	.00859	.00853	.00846	.00840	.00835
1	.00281	.00273	.00265	.00257	.00250	.00244	.00237	.00232	.00226	.00221
2	.00267	.00258	.00249	.00241	.00234	.00227	.00220	.00214	.00208	.00202
3	.00268	.00259	.00249	.00241	.00233	.00225	.00218	.00212	.00205	.00199
4	.00279	.00268	.00258	.00249	.00241	.00233	.00225	.00218	.00211	.00205
5	.00295	.00284	.00273	.00263	.00254	.00245	.00237	.00229	.00222	.00215
6	.00316	.00304	.00293	.00283	.00273	.00263	.00254	.00246	.00238	.00230
7	.00341	.00328	.00316	.00305	.00294	.00284	.00274	.00265	.00256	.00248
8	.00371	.00357	.00344	.00332	.00320	.00310	.00299	.00289	.00280	.00271
9	.00408	.00393	.00379	.00366	.00353	.00341	.00330	.00320	.00310	.00300
10	.00450	.00434	.00419	.00405	.00392	.00379	.00367	.00356	.00345	.00335
11	.00500	.00483	.00467	.00452	.00438	.00424	.00411	.00399	.00387	.00376
12	.00557	.00538	.00521	.00505	.00490	.00476	.00462	.00449	.00436	.00425
13	.00617	.00597	.00579	.00562	.00546	.00531	.00516	.00502	.00489	.00477
14	.00677	.00656	.00637	.00619	.00602	.00585	.00570	.00555	.00541	.00528
15	.00733	.00712	.00691	.00672	.00654	.00636	.00620	.00605	.00590	.00576
16	.00784	.00761	.00739	.00719	.00700	.00681	.00664	.00648	.00632	.00618
17	.00829	.00805	.00782	.00761	.00741	.00721	.00703	.00686	.00670	.00654
18	.00870	.00845	.00821	.00798	.00777	.00756	.00737	.00719	.00702	.00685
19	.00909	.00882	.00856	.00832	.00810	.00788	.00768	.00749	.00731	.00713
20	.00948	.00919	.00892	.00867	.00843	.00821	.00799	.00779	.00760	.00741
21	.00986	.00956	.00927	.00901	.00875	.00851	.00829	.00807	.00787	.00767
22	.01024	.00992	.00962	.00933	.00906	.00881	.00857	.00834	.00813	.00792
23	.01065	.01030	.00998	.00968	.00939	.00912	.00887	.00862	.00839	.00818
24	.01110	.01074	.01040	.01007	.00977	.00948	.00921	.00895	.00870	.00847
25	.01165	.01126	.01089	.01055	.01022	.00991	.00962	.00934	.00908	.00884
26	.01228	.01187	.01148	.01111	.01076	.01043	.01012	.00982	.00955	.00928
27	.01303	.01259	.01217	.01178	.01140	.01105	.01072	.01040	.01010	.00982
28	.01390	.01342	.01297	.01255	.01215	.01178	.01142	.01108	.01076	.01046
29	.01486	.01435	.01387	.01342	.01299	.01259	.01221	.01185	.01150	.01117
30	.01591	.01537	.01486	.01437	.01392	.01348	.01307	.01269	.01232	.01197
31	.01707	.01649	.01594	.01542	.01493	.01447	.01403	.01361	.01322	.01284
32	.01833	.01771	.01713	.01657	.01605	.01555	.01508	.01464	.01421	.01381
33	.01971	.01905	.01843	.01784	.01728	.01674	.01624	.01576	.01531	.01487
34	.02119	.02049	.01982	.01919	.01859	.01802	.01748	.01697	.01648	.01602

Internal Revenue Service, Treasury

§ 1.664-4T

Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
35	.02280	.02204	.02133	.02065	.02001	.01940	.01883	.01828	.01775	.01726
36	.02452	.02372	.02296	.02224	.02155	.02090	.02028	.01969	.01913	.01860
37	.02638	.02553	.02471	.02394	.02321	.02252	.02185	.02123	.02063	.02006
38	.02839	.02748	.02661	.02579	.02501	.02427	.02356	.02289	.02225	.02164
39	.03055	.02957	.02865	.02777	.02694	.02615	.02539	.02467	.02399	.02333
40	.03285	.03181	.03083	.02990	.02901	.02816	.02735	.02658	.02585	.02515
41	.03531	.03421	.03316	.03217	.03122	.03032	.02946	.02863	.02785	.02710
42	.03793	.03676	.03565	.03459	.03358	.03262	.03170	.03082	.02999	.02919
43	.04076	.03952	.03833	.03721	.03613	.03510	.03413	.03319	.03230	.03144
44	.04378	.04246	.04120	.04000	.03886	.03777	.03672	.03573	.03477	.03386
45	.04701	.04561	.04427	.04299	.04178	.04062	.03950	.03844	.03743	.03645
46	.05047	.04898	.04757	.04621	.04492	.04368	.04250	.04137	.04029	.03925
47	.05416	.05258	.05108	.04964	.04827	.04696	.04570	.04449	.04334	.04224
48	.05810	.05644	.05484	.05332	.05186	.05047	.04913	.04785	.04662	.04545
49	.06233	.06057	.05888	.05727	.05572	.05424	.05282	.05146	.05016	.04890
50	.06690	.06503	.06325	.06154	.05990	.05833	.05683	.05538	.05399	.05266
51	.07181	.06984	.06796	.06615	.06442	.06275	.06116	.05962	.05815	.05673
52	.07712	.07504	.07305	.07114	.06931	.06755	.06585	.06423	.06267	.06116
53	.08282	.08063	.07853	.07652	.07458	.07272	.07093	.06921	.06756	.06596
54	.08893	.08663	.08442	.08229	.08025	.07829	.07640	.07458	.07283	.07114
55	.09544	.09302	.09070	.08846	.08631	.08424	.08224	.08032	.07847	.07669
56	.10230	.09976	.09732	.09497	.09270	.09052	.08842	.08639	.08444	.08256
57	.10952	.10686	.10430	.10183	.09945	.09716	.09495	.09281	.09075	.08877
58	.11709	.11431	.11162	.10904	.10654	.10413	.10181	.09956	.09739	.09530
59	.12506	.12215	.11934	.11663	.11402	.11149	.10905	.10669	.10441	.10221
60	.13349	.13045	.12751	.12468	.12194	.11929	.11674	.11426	.11187	.10955
61	.14236	.13919	.13613	.13317	.13031	.12754	.12486	.12227	.11976	.11733
62	.15166	.14836	.14517	.14208	.13909	.13620	.13340	.13069	.12806	.12551
63	.16138	.15795	.15463	.15141	.14830	.14528	.14235	.13952	.13677	.13410
64	.17155	.16799	.16453	.16119	.15794	.15480	.15175	.14879	.14592	.14313
65	.18220	.17850	.17492	.17144	.16806	.16479	.16161	.15853	.15553	.15262
66	.19358	.18975	.18604	.18243	.17893	.17552	.17222	.16901	.16589	.16285
67	.20568	.20173	.19788	.19415	.19052	.18699	.18356	.18022	.17698	.17382
68	.21847	.21439	.21042	.20656	.20280	.19915	.19560	.19213	.18877	.18549
69	.23191	.22771	.22362	.21964	.21577	.21199	.20831	.20473	.20124	.19784
70	.24601	.24169	.23748	.23339	.22939	.22550	.22171	.21801	.21440	.21088

Table U(1) - Unitrust Single Life Remainder Factors
 Based on Life Table 2000CM
 Applicable on or After May 1, 2009

AGE	Adjusted Payout Rate									
	12.2%	12.4%	12.6%	12.8%	13.0%	13.2%	13.4%	13.6%	13.8%	14.0%
71	.26080	.25638	.25206	.24785	.24375	.23974	.23584	.23202	.22830	.22467
72	.27630	.27178	.26736	.26305	.25884	.25473	.25071	.24679	.24296	.23922
73	.29244	.28782	.28331	.27890	.27460	.27039	.26628	.26226	.25833	.25449
74	.30914	.30444	.29984	.29535	.29096	.28666	.28245	.27834	.27432	.27038
75	.32630	.32153	.31686	.31229	.30782	.30344	.29915	.29496	.29085	.28682
76	.34389	.33905	.33432	.32968	.32514	.32069	.31633	.31205	.30787	.30376
77	.36187	.35698	.35220	.34750	.34290	.33839	.33396	.32963	.32537	.32120
78	.38022	.37530	.37047	.36573	.36108	.35652	.35204	.34765	.34333	.33910
79	.39891	.39396	.38910	.38433	.37965	.37504	.37053	.36609	.36173	.35744
80	.41786	.41290	.40802	.40323	.39852	.39389	.38934	.38486	.38047	.37615
81	.43703	.43207	.42719	.42238	.41766	.41302	.40845	.40395	.39953	.39518
82	.45638	.45143	.44655	.44175	.43703	.43238	.42781	.42330	.41887	.41450
83	.47583	.47090	.46604	.46126	.45655	.45191	.44734	.44284	.43840	.43403
84	.49532	.49043	.48561	.48085	.47617	.47155	.46700	.46251	.45808	.45372
85	.51480	.50996	.50518	.50047	.49582	.49124	.48671	.48225	.47785	.47351
86	.53421	.52943	.52470	.52004	.51544	.51090	.50642	.50200	.49763	.49332
87	.55346	.54875	.54409	.53950	.53496	.53047	.52604	.52167	.51734	.51307
88	.57254	.56791	.56333	.55881	.55434	.54992	.54555	.54124	.53697	.53275
89	.59134	.58680	.58231	.57788	.57349	.56914	.56485	.56060	.55640	.55225
90	.60982	.60538	.60099	.59665	.59234	.58809	.58388	.57971	.57558	.57150
91	.62794	.62361	.61932	.61508	.61087	.60671	.60259	.59851	.59447	.59046
92	.64564	.64142	.63725	.63311	.62901	.62495	.62093	.61694	.61299	.60907
93	.66284	.65874	.65468	.65066	.64667	.64272	.63880	.63491	.63106	.62724
94	.67955	.67558	.67164	.66773	.66386	.66002	.65621	.65243	.64868	.64496
95	.69574	.69190	.68809	.68431	.68055	.67683	.67313	.66946	.66582	.66221
96	.71131	.70760	.70391	.70025	.69662	.69302	.68944	.68588	.68235	.67885
97	.72626	.72268	.71913	.71560	.71209	.70861	.70515	.70171	.69829	.69490
98	.74063	.73718	.73376	.73035	.72697	.72361	.72027	.71695	.71365	.71037
99	.75442	.75111	.74781	.74454	.74128	.73804	.73483	.73163	.72844	.72528
100	.76744	.76426	.76109	.75794	.75481	.75169	.74860	.74551	.74245	.73940
101	.78001	.77695	.77392	.77089	.76788	.76489	.76191	.75895	.75600	.75306
102	.79172	.78879	.78587	.78297	.78008	.77720	.77434	.77149	.76865	.76582
103	.80354	.80074	.79795	.79517	.79240	.78965	.78690	.78417	.78145	.77874
104	.81442	.81174	.80906	.80640	.80374	.80110	.79847	.79584	.79323	.79063
105	.82511	.82254	.81998	.81742	.81488	.81234	.80982	.80730	.80479	.80229
106	.83887	.83646	.83405	.83165	.82926	.82687	.82449	.82212	.81975	.81739
107	.85466	.85243	.85020	.84798	.84576	.84355	.84134	.83914	.83694	.83474
108	.88172	.87984	.87797	.87610	.87423	.87236	.87049	.86862	.86676	.86490
109	.93900	.93800	.93700	.93600	.93500	.93400	.93300	.93200	.93100	.93000

(f) *Effective/applicability date.* This section applies on or after May 1, 2009.

(g) *Expiration date.* This section expires on or before May 1, 2012.

[T.D. 9448, 74 FR 21465, May 7, 2009]

TREATMENT OF EXCESS DISTRIBUTIONS OF TRUSTS APPLICABLE TO TAXABLE YEARS BEGINNING BEFORE JANUARY 1, 1969

§ 1.665(a)-0 Excess distributions by trusts; scope of subpart D.

Subpart D (section 665 and following), part I, subchapter J, chapter 1 of the Internal Revenue Code, in the case of trusts other than foreign trusts created by U.S. persons, is designed generally to prevent a shift of tax burden to a trust from a beneficiary or beneficiaries. In the case of a foreign trust created by a U.S. person, subpart D is designed to prevent certain other tax avoidance possibilities. To accomplish these ends, subpart D provides special rules for treatment of amounts paid, credited, or required to be distributed by a complex trust (subject to subpart C (section 661 and following) of such part I) in any year in excess of distributable net income for that year. Such an excess distribution is defined as an accumulation distribution, subject to the limitations in section 665 (b) or (c). An accumulation distribution, in the case of a trust other than a foreign trust created by a U.S. person, is "thrown back" to each of the 5 preceding years in inverse order. In the case of a foreign trust created by a U.S. person such an accumulation distribution is "thrown back," in inverse order, to each of the preceding years to which the Internal Revenue Code of 1954 applies. That is, an accumulation distribution will be taxed to the beneficiaries of the trust in the year the distribution is made or required, but, in general, only to the extent of the distributable net income of those years which was not in fact distributed. However, with respect to a distribution by a trust other than a foreign trust created by a U.S. person, the resulting tax will not be greater than the aggregate of the taxes that would have been attributable to the amount thrown back to previous years had they been included in gross income of the bene-

ficiaries in those years. In the case of a foreign trust created by a U.S. person, the resulting tax is computed under the provisions of section 669. To prevent double taxation, both in the case of a foreign trust created by a U.S. person, and a trust other than a foreign trust created by a U.S. person, the beneficiaries receive a credit for any taxes previously paid by the trust which are attributable to the excess thrown back and which are creditable under the provisions of chapter 1 of the Internal Revenue Code. Subpart D does not apply to any estate.

[T.D. 6989, 34 FR 733, Jan. 17, 1969]

§ 1.665(a)-1 Undistributed net income.

(a) The term *undistributed net income* means for any taxable year the distributable net income of the trust for that year as determined under section 643(a), less:

(1) The amount of income required to be distributed currently and any other amounts properly paid or credited or required to be distributed to beneficiaries in the taxable year as specified in paragraphs (1) and (2) of section 661(a), and

(2) The amount of taxes imposed on the trust, as defined in § 1.665(d)-1.

The application of the rule in this paragraph to the first year of a trust in which income is accumulated may be illustrated by the following example:

Example. Assume that under the terms of the trust, \$10,000 of income is required to be distributed currently to A and the trustee has discretion to make additional distributions to A. During the taxable year 1954 the trust had distributable net income of \$30,100 derived from royalties and the trustee made distributions of \$20,000 to A. The taxable income of the trust is \$10,000 on which a tax of \$2,640 is paid. The undistributed net income of the trust as of the close of the taxable year 1954 is \$7,460 computed as follows:

Distributable net income	\$30,100
Less:	
Income currently distributable to A	\$10,000
Other amounts distributed to A ..	10,000
Taxes imposed on the trust (see § 1.665(d)-1)	2,640
	22,640
Undistributed net income	7,460

See also paragraphs (e)(1) and (f)(1) of § 1.668(b)-2 for additional illustrations of the